

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|  |   |                                 |
|--|---|---------------------------------|
| Mingfei Zhu  | ) |                                 |
|  | ) |                                 |
| Plaintiff,   | ) | Case No.: 24-cv-01139           |
| v.   | ) | Judge: Hon. Virginia M. Kendall |
|  | ) |                                 |
| The Partnerships and Unincorporated<br>Associations Identified in<br>Schedule "A", | ) |                                 |
|  | ) |                                 |
| Defendants.  | ) |                                 |
|  | ) |                                 |

**DECLARATION OF Juan Zheng**

I, Juan Zheng, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States that the following is true and correct:

1. I am a citizen and resident of the People's Republic of China and I am over the age of 18.
2. I am providing this Declaration in support of the Defendant's Motion to Dismiss
3. I am the manager of the internet stores, named as Defendants in this lawsuit:  
  
liukouuly (40), nusind (57), SuchinmL (73), Wadiue-US (85), Xiecaiboe-US (89),  
yanmeerA (93), Angrybaby (104), Aphooooorism (105), BaiFuXin (106), BeautifulLake  
(107), C9Dshop (108), jiangliRR (117), joeyyy (119), keoshlunlun (121), LL-Utopia  
(123), loveryu (124), qatsebcd (127), Qeearsstore (128), Soullmmate (129),  
WanDmaoStudio (132), xafuvogt (134) (hereinafter "Stores").
4. I have personal knowledge of and I am competent to testify about the facts set forth herein.
5. We have a physical office located at Rooms 207, 208 and 209 on the second floor of Building B, Nan Yuede Building, Shandong Chengzhong Road, Dongcheng Street, Dongguan, Guangdong Province, China, 523000
6. We are not registered to do business in Illinois.

7. We have no regular and established place of business in Illinois.
8. We do not maintain any offices, employees, or telephone listings in Illinois.
9. We have no manufacturing facility or distribution facility in Illinois.
10. We do not pay taxes or maintain any bank accounts in Illinois and do not participate in any business meetings, seminars, or other marketing related activities in Illinois.
11. We have no employees who visit Illinois for business purposes, and do not send agents in Illinois to solicit business.
12. We do not own any real or personal property in Illinois.
13. None of our potential witnesses are located in Illinois.
14. It would be extremely burdensome and expensive for us to litigate the case in Illinois because none of our witnesses or documents are located in this District.
15. Our operations related to the allegations in this case are located in China.
16. We sold 10 items of Accused Products for a revenue of \$129.39. There is 0 Shipped to Illinois, attached as Exhibit A.
17. We respectfully ask the Court to dismiss the lawsuit against our stores.

I declare under penalty of perjury under the laws of the United States that the foregoing statements and facts are true and correct.

Executed on: 4/25/2024

Juan Zheng

Date: 4/25/2024

BY: JUAN ZHENG

# Exhibit A

| Doe   | Store Name    | Sales Volume | Sales Revenue in USD | Sales Volume to IL |
|-------|---------------|--------------|----------------------|--------------------|
| 40    | liukouuly     | 4            | 47.49                | 0                  |
| 57    | nusind        | 0            | 0                    | 0                  |
| 73    | SuchinmL      | 0            | 0                    | 0                  |
| 85    | Wadiue-US     | 0            | 0                    | 0                  |
| 89    | Xiecaiboe-US  | 0            | 0                    | 0                  |
| 93    | yanmeerA      | 1            | 15.62                | 0                  |
| 104   | Angrybaby     | 0            | 0                    | 0                  |
| 105   | Aphooooorism  | 1            | 7.19                 | 0                  |
| 106   | BaiFuXin      | 0            | 0                    | 0                  |
| 107   | BeautifulLake | 0            | 0                    | 0                  |
| 108   | C9Dshop       | 0            | 0                    | 0                  |
| 117   | jiangliRR     | 1            | 11.83                | 0                  |
| 119   | joeyyy        | 0            | 0                    | 0                  |
| 121   | keoshlunlun   | 0            | 0                    | 0                  |
| 123   | LL-Utopia     | 3            | 47.26                | 0                  |
| 124   | loveryu       | 0            | 0                    | 0                  |
| 127   | qatsebcd      | 0            | 0                    | 0                  |
| 128   | Qeearsstore   | 0            | 0                    | 0                  |
| 129   | Soullmmate    | 0            | 0                    | 0                  |
| 132   | WanDmaoStudio | 0            | 0                    | 0                  |
| 134   | xafuvogt      | 0            | 0                    | 0                  |
| Total |               | 10           | 129.39               | 0                  |